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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

Kashane Kirk, *et al.*,

Plaintiffs,

vs.

City of Phoenix, *et al.*,

Defendants.

Case No. CV 23-00836-MTL (CDB)

**STIPULATION FOR ENTRY OF
PROTECTIVE ORDER**

Plaintiffs Kashane Kirk, Sharon Roberts, and Brittnie Turner (collectively referred to hereinafter as “Plaintiffs”), and Defendants City of Phoenix, Phoenix Police Department, Chief Michael Sullivan, Officer Autumn Ladines, Officer Antonio Garza, Sergeant Eric Roy, Officer Jaclyn Ravelo, Officer Steven Ramirez, and Sergeant Jonathan Howard, (collectively referred to hereinafter as “Defendants”), by and through counsel undersigned, hereby stipulate and jointly request the Court enter the Protective Order submitted herewith at Exhibit 1. The Order will govern the documents requested by Plaintiffs and produced by Defendants and will remain in effect through trial/appeal.

1 The parties stipulate that the Court enter the Protective Order to properly balance
2 the discovery rights of the Plaintiffs with Defendants right to protect confidential
3 information.

4 The Protective Order is approved as to form and content by counsel for both parties.

5 RESPECTFULLY SUBMITTED this 3rd day of April, 2025.

6 BROENING OBERG WOODS & WILSON, P.C.

7
8 By /s/ Jeremiah M. Sullivan

9 Sarah L. Barnes

10 Kelley M. Jancaitis

11 Jeremiah M. Sullivan

12 *Attorney for Defendants*

13 MILLS + WOODS LAW, PLLC

14 By /s/ Sean A. Woods (with permission)

15 Sean A. Woods

16 Robert T. Mills

17 *Attorneys for Plaintiffs*

CERTIFICATE OF SERVICE

I hereby certify that on April 3, 2025 I electronically transmitted the foregoing with the Clerk of the Court using the CM/ECF system for filing, with copies submitted electronically to the following recipients:

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/s/ Suzanne Beard
